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Attorneys for Zia's Children Education Trust

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.  
-----X

In re:

BERNARD L. MADOFF,

Debtor.  
-----X

Adversary Proceeding  
No. 08-01789-BRL

SIPA Liquidation  
(Substantively Consolidated)

**OBJECTION TO TRUSTEE'S DETERMINATION  
OF THE CUSTOMER CLAIM OF ZIA'S  
CHILDREN EDUCATION TRUST (CLAIM NO. 015826)**

Zia's Children Education Trust ("Trust"), by and through its attorneys, as and for its objection to the Trustee's determination denying its customer claim (Claim No. 015826), states as follows:<sup>1</sup>

1. The Trust is a "customer" of Bernard L. Madoff Investment Securities LLC ("BLMIS") as that term is defined in the Securities Investor Protection Act ("SIPA"). The Trust had an account with BLMIS.
2. The Trustee's determination denying the Trust's claim on the ground that it is not a "customer" of BLMIS under SIPA and that it did not have an account with BLMIS is erroneous and contrary to law.
3. Accordingly, the Trust's claim should be allowed in full as filed.
4. To the extent applicable, the Trust joins in the objections of other claimants whose claims have been denied by the Trustee on the same or similar grounds.
5. The Trust reserves the right to revise, supplement, or amend this objection. Any failure to object on a particular ground or grounds shall not be construed as a waiver of the Trust's right to object on any additional grounds.
6. The Trust reserves the right to subsequently file a memorandum of law and other documentary support in connection with any scheduled hearing and further proceedings of this matter.

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<sup>1</sup>The Trustee previously granted the Trust's request for an extension of time in which to file its objection. The extended deadline for filing is February 9, 2011.

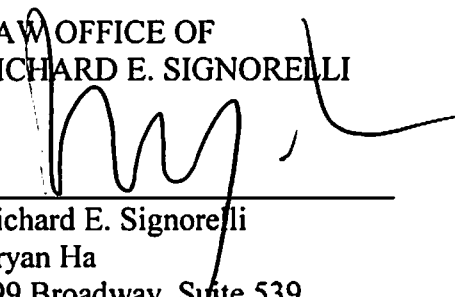
7. All further notices concerning this matter should be served upon  
the undersigned counsel.

Dated: New York, New York  
January 11, 2011

Respectfully submitted,

LAW OFFICE OF  
RICHARD E. SIGNORELLI

By:



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Attorneys for  
Zia's Children Education Trust

**AFFIRMATION OF SERVICE**

BRYAN HA, an attorney duly admitted to practice before the Courts of the State of New York, affirms under the penalties of perjury pursuant to Title 28, United States Code, Section 1746, that on January 11, 2011 he served a copy of the within Objection To Trustee's Determination Of The Customer Claim of Zia's Children Education Trust (Claim No. 015826) on the following persons by U.S. First Class Mail:

Clerk of the United States Bankruptcy Court for  
the Southern District of New York  
One Bowling Green  
New York, New York 10004

Irving H. Picard, Trustee  
c/o Baker & Hostetler LLP  
Attn: Claims Department  
45 Rockefeller Plaza  
New York, New York 10111

Dated: New York, New York  
January 11, 2011



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Bryan Ha